

**STOLL, GLICKMAN  
& BELLINA** ATTORNEYS  
AT LAW

**MEMO ENDORSED**

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June 06, 2008

Honorable Judge Naomi Buchwald  
U.S. District Court, SDNY  
500 Pearl St. Rm. 2270  
New York, NY 10007  
BY FAX

Re: Oneil Edwards v. City of New York et al. 07CV8390(NRB)

Dear Honorable Judge Buchwald-

I write to request permission to amend the complaint in the above case and to request an extension of the discovery deadline currently set for July 31, 2008. Opposing counsel, Assistant Corporation Counsel Sumit Sud, consents to this request. This is our second request for an extension of the discovery deadline.

*Application  
for leave to  
amend  
granted.  
HKB*

In June of 2007, plaintiff was transported to Bronx Supreme Court from Riker's Island for a court appearance. On his way back to the pens within the courthouse, he was assaulted by another inmate. It is plaintiff's position that the escorting officers caused his injury by failing to properly separate plaintiff, who was designated for protective custody, from an agitated dangerous inmate.

Our amended complaint named a Correction Officer who signed an injury to inmate report. Opposing counsel has since informed me that the Correction Officer arrived on the scene after the assault. He believes the assault occurred in the presence of Court Officers. In response, I subpoenaed a list of the Court Officers assigned to the courtroom on the day of the incident. I wish to amend to add the Sergeant assigned to the courtroom, and who therefore was actually present, or acted as supervisor for the officers who were actually present, when the assault occurred.

Because this amendment will likely bring the State Attorney General's Office into the case, and require time for them to answer and additional paper discovery, I respectfully request an additional 90 days to complete discovery.

*Application  
granted.  
Discovery*

*must be  
completed by  
November 28, 2008.  
No extension*

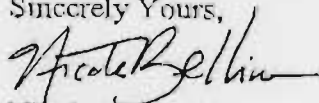
*So ordered.  
Hon. Judge Buchwald  
6/24/08*

**MEMO ENDORSED**

RECEIVED BY CHAMBER  
OF NAOMI BUCHWALD  
JUN - 6 2008  
UNITED STATES DISTRICT JUDGE

Thank you for your consideration.

Sincerely Yours,

A handwritten signature in cursive script, appearing to read "Nicole Bellina".

Nicole Bellina

718 852 4491

Attorney for Plaintiff

cc: ACC Summit Sud (BY EMAIL)